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Counsel for Plaintiff  
**BRUCE E. KRELL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BRUCE E. KRELL,

No. 15-CV-1833

Plaintiff,

v.

CITY & COUNTY OF SAN FRANCISCO,  
OFFICER BEL GELASIO (#20), OFFICE OF THE  
TREASURER AND TAX COLLECTOR, RON  
MEUNIER (#14), OFFICER CHARLES SMITH,  
OFFICER ADRIAN GIANINI, and DOES 1-40,

**STIPULATION TO CONTINUE HEARINGS  
ON MOTION TO DISMISS AND MOTION TO  
STRIKE, TO CONTINUE INITIAL CASE  
MANAGEMENT CONFERENCE, AND TO  
CONTINUE ALL FILING DEADLINES;  
[PROPOSED] ORDER THEREON**

**[DEMAND FOR JURY TRIAL]**

Defendants.

PLAINTIFF BRUCE K. KRELL AND DEFENDANT CITY & COUNTY OF SAN  
FRANCISCO HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. On June 1, 2015, Defendant City & County of San Francisco filed a motion to dismiss Plaintiff's complaint pursuant to Federal Rules of Civil Procedure, Rule 12(b)(6). That same date, Defendant City & County of San Francisco filed a special motion to strike Plaintiff's state cause of action pursuant to California Code of Civil Procedure, section 425.16. Plaintiff's oppositions to both motions are due June 15, 2015. The parties presently have their initial, joint Case Management Statement due by July 14, 2015, and the Case Management Conference set for July 21, 2015, at 1:30 PM in Courtroom 4, 3rd Floor, of this Court's Oakland courthouse.

2. The parties, through counsel of record, have met and conferred and agreed on the following modifications to the above, pending approval of the Court:

- a. Plaintiff's oppositions to both motions will be due July 27, 2015;
- b. Defendant's replies as to both motions will be due August 10, 2015;
- c. Hearing of both motions will be September 3, 2015, at 11:00 AM, in Courtroom 4, 3rd Floor, of this Court's Oakland courthouse.
- d. The parties' initial, joint Case Management Statement will be due by September 29, 2015, and the Case Management Conference will be set for October 6, 2015, at 1:30 PM in Courtroom 4, 3rd Floor, of this Court's Oakland courthouse.

3. Good cause for extension of the briefing schedule exists in that Plaintiff's counsel requires additional time to prepare opposition briefs. Good cause exists for continuance of the case management conference in order to give the Court time to rule on both motions and to permit the parties to engage in settlement discussions prior to incurring expense of discovery; the current date of the case management conference is July 21, 2015, when the Court is unavailable; and, in addition, defense counsel has a pre-scheduled, prepaid vacation on that same date.

Date: June 9, 2015

/s/ Russell A. Robinson  
 Russell A. Robinson  
 Law Office of Russell A. Robinson  
 Counsel for Plaintiff  
**BRUCE E. KRELL**

Date: June 9, 2015

/s/ Peter J. Keith  
 Peter J. Keith  
 Deputy City Attorney  
 City & County of San Francisco  
 Counsel for Defendant  
**CITY & COUNTY OF SAN FRANCISCO**

**ORDER**

Good cause appearing, it is hereby ordered as follows:

Plaintiff's oppositions to the June 1, 2015, motion to dismiss and special motion to strike will be due July 27, 2015.

Defendant's replies as to both motions will be due August 10, 2015.

Hearing of both motions take place on September 3, 2015, at 11:00 AM, in Courtroom 4, 3rd Floor, of this Court's Oakland courthouse.

The parties' initial, joint Case Management Statement shall be due by September 29, 2015, and the Case Management Conference take place on October 6, 2015, at 1:30 PM in Courtroom 4, 3rd Floor, of this Court's Oakland courthouse.

**IT IS SO ORDERED.**

Date: June 15, 2015

  
Magistrate Judge Kandis A. Westmore  
USDC, Northern District of California